

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRAVELERS CASUALTY INSURANCE)	
COMPANY OF AMERICA,)	
)	Case No: 1:23-cv-01154
Plaintiff,)	
vs.)	Hon. Sara L. Ellis
)	
WESTWARD MANAGEMENT, INC.,)	
KENMORE CLUB CONDOMINIUM)	
ASSOCIATION, HARRY CHANNON and)	
DAWN CHANNON,)	
)	
Defendants.)	

**AGREED MOTION OF DEFENDANT WESTWARD MANAGEMENT, INC.
FOR A SECOND EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendant WESTWARD MANAGEMENT, INC. (“Westward”), by and through its attorneys, JAMES M. WECK, ILENE M. KOREY and CLAUSEN MILLER P.C., and for its Agreed Motion for a Second Extension of Time to Answer or Otherwise Plead, states as follows:

1. On April 11, 2023, this Court granted Westward’s initial request for an extension of time to respond to Plaintiff’s Complaint (Dkt. 11) allowing until May 8, 2023 to answer or otherwise plead.

2. This Court’s Minute Order (Dkt. 11) set the parties’ joint status report be filed on May 3, 2023 and a status hearing on May 10, 2023. The parties filed the joint status report contemporaneously with this agreed motion and propose this Court reset the status hearing currently set for May 10, 2023 to a date after June 12, 2023.

3. In the underlying litigation, Plaintiffs, Harry and Dawn Channon, failed to file their Amended Complaint, Count II – Illinois Consumer Fraud and Deceptive Business Practices

Act, which was due on or before April 18, 2023. Count I of the Complaint for the underlying action – Illinois Condominium Property Act of the underlying Complaint (Dkt. 1-1), was dismissed with prejudice by the Circuit Court of Cook County in March 2023.

4. Defendant needs additional time to investigate the facts and issues presented by Plaintiff's Complaint for Declaratory Judgment.

5. Defendant requests an extension of time, until June 9, 2023, to answer or otherwise plead in this matter.

6. Plaintiff's counsel does not object to this request for additional time.

7. This motion is brought in good faith and not for delay or any improper purpose.

WHEREFORE, Defendant WESTWARD MANAGEMENT, INC., respectfully requests that this Honorable Court enter the following order granting Defendant's Agreed Motion for a Second Extension of Time to Answer or Otherwise Plead and allowing Defendant Westward Management, Inc., until June 9, 2023 to answer or otherwise plead.

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CERTIFICATE OF SERVICE

The undersigned, a non-attorney, hereby certifies that on the **3rd day of May 2023**, she electronically filed the foregoing **Defendant Westward Management, Inc.'s Agreed Motion for a Second Extension of Time to Answer or Otherwise Plead** with the Clerk of the Court using CM/ECF system which sent notification of such filing to the parties who are registered participants with the System.

Patricia Kebr

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